

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**The Western Massachusetts Electric
Company**

D.T.E. 04-40/04-109/05-10

**ATTORNEY GENERAL'S SECOND SET OF
DOCUMENT AND INFORMATION REQUESTS TO THE WESTERN
MASSACHUSETTS ELECTRIC COMPANY**

AG-2-1 Referring to the response to AG-01-004, please explain how the after-tax carrying cost was calculated and why it is different from the pre-tax carrying cost times 60.775%.

AG-2-2 Referring to the response to AG-01-006, page 2, is it the Company's position that the Department explicitly authorized the proposed 50/50 sharing of the costs between customers and shareholders in DTE 03-82? If the response is affirmative, please provide a specific citation to such authorization. If the response is negative, please provide the authorization for the 50% sharing.

AG-2-3 Please explain why the Company believes that it is appropriate to include the SOS Under (Over) Recoveries in the transition charge rather than reconciling the Under (Over) Recoveries through Basic Service charges.

AG-2-4 Referring to Exhibit RAB-1, Page 1, please explain why the SOS revenues were \$2,856,000 less than the SOS costs in 2002.

AG-2-5 Referring to Exhibit RAB-7, Page 1, please explain why the SOS revenues were \$4,627,000 less than the SOS costs in 2003.

AG-2-6 Referring to Mahoney testimony, page 7, please provide specific cites to where past DS over/under-recoveries have been included in transition charge reconciliations.

AG-2-7 Referring to the response to AG-01-007, page 4, if the 2001 DS under-recovery was recovered over the twelve months in 2003, why is Company proposing to also include the 2001 DS under-recovery in the 2003 transition charge reconciliation?

- AG-2-8 Referring to the response to AG-01-010, page 4, why is the Hydro-Quebec revenue so much less in 2004 than in 2003?
- AG-2-9 Referring to the response to AG-01-011, please identify the associated expenses netted against Hydro-Quebec revenues on Exhibit MJM-3, page 9. The response should also describe the distinction between Hydro-Quebec expenses included in Column J on Exhibit MJM-3, page 9 and the expenses netted against revenues in Column K.
- AG-2-10 Referring to the response to AG-01-017, please explain how the Company estimates the SOS and DS unbilled revenue as of the end of a given month.
- AG-2-11 Exhibit RAB-9, page 2 shows approximately \$12.7 million of billed SOS revenue in February 2005. Please explain why the unbilled SOS revenue as of February 28, 2005 on page 4 of the response to AG-01-017 is only \$4.6 million, which is substantially less than one-half of the billed revenue for February 2005.
- AG-2-12 What was the billed SOS revenue in December 2001?
- AG-2-13 Please explain why the interest on the SOS and DS over/under-recoveries is calculated on the pre-tax balances rather than on the after-tax balances.
- AG-2-14 Referring to the response to AG-01-018, please provide specific cites to any explicit authorization by the Department to include Generation Information Systems Costs and Consulting Costs in reconcilable SOS costs.
- AG-2-15 Referring to the response to AG-01-023, please provide specific cites to any explicit authorization by the Department to include the Legal Costs on SOS/DS Litigation in reconcilable SOS and/or DS costs.
- AG-3-16 For the years 2004 and 2003, please provide the monthly standard offer revenues for each class.
- AG-3-17 For the years 2004 and 2003, please provide the monthly default service revenues for each class.
- AG-3-18 For the years 2004 and 2003, please provide the monthly transmission revenues for each class.
- AG-3-19 For the years 2004 and 2003, please provide the monthly transition revenues for each class.

- AG-3-20 For the years 2004 and 2003, please provide the actual monthly bill determinants for each rate element for each class.
- AG-3-21 Please provide copies of all the monthly standard offer service invoices for the years 2003 and 2004. Each invoice should be annotated with the date and amount paid. If any amounts are disputed, please provide the amount in dispute, the status of the dispute, the basis for the dispute and if the disputed amount is included in the costs included in the reconciliation, explain why the Company is passing on such costs. Include a summary schedule tabulating the total of the invoices to correspond the amount included in the reconciliation with reference to the exhibit, page and line where the charge is included.
- AG-3-22 Please provide copies of all the monthly default service invoices for the years 2003 and 2004. Each invoice should be annotated with the date and amount paid. If any amounts are disputed, please provide the amount in dispute, the status of the dispute, the basis for the dispute and if the disputed amount is included in the costs included in the reconciliation, explain why the Company is passing on such costs. Include a summary, with sub-totals for each default service class, tabulating the total of the invoices to correspond the amount included in the reconciliation with reference to the exhibit, page and line where the charge is included.
- AG-3-23 Refer to Exhibit MJM-4, pages 2-5. Please provide copies of all the monthly invoices supporting each line item in this exhibit for the years 2002, 2003, 2004 and 2005, to date. Each invoice should be annotated with the date and amount paid. If any amounts are disputed, please provide the amount in dispute, the status of the dispute, the basis for the dispute and if the disputed amount is included in the costs included in the reconciliation, explain why the Company is passing on such costs. Include a summary schedule tabulating the total of the invoices to correspond the amount included in the reconciliation with reference to the exhibit, page and line where the charge is included.
- AG-3-24 Refer to Exhibit MJM-4. Please provide copies of the FERC approved tariffs under which the costs that are included in this exhibit are billed. The tariffs should be annotated or a key provided to identify the provisions governing the charges for each of the specific line items on Exh. MJM-4. The tariffs that should be provided include, but are not limited to, NU Tariff No. 9 and No. 10, and the various NEPOOL and ISO-NE tariff provisions.
- AG-3-25 For the years 2002-2005 to date, please provide the supporting cost of service data and the formula rate calculations supporting the charges for Local Network Service, Regional Network Service, Scheduling and Dispatch Service, Audit Charges, ISO Schedule 1, ISO Schedule 3, Black Start, RMR, VAR Support/OATT Sch. 2 and

Somerset Jet. Explain how each of the charges are determined, including how adjustments and true-ups are reflected in the charges.

- AG-3-26 Are any costs that are included in Local Network Service included in Regional Network Service costs? If yes, explain why this is not double recovery. Identify the duplicated costs by FERC account number and sub-account number, if any. Provide a copy of the tariff provisions that permit the inclusion of these costs in both charges.
- AG-3-27 Are any costs that are included in Local Network Service included in Scheduling and Dispatch Service costs? If yes, explain why this is not double recovery. Identify the duplicated costs by FERC account number and sub-account number, if any. Provide a copy of the tariff provisions that permit the inclusion of these costs in both charges.
- AG-3-28 Are any costs that are included in Regional Network Service included in Scheduling and Dispatch costs? If yes, explain why this is not double recovery. Identify the duplicated costs by FERC account number and sub-account number, if any. Provide a copy of the tariff provisions that permit the inclusion of these costs in both charges.
- AG-3-29 Are any costs that are included in Local Network Service, Regional Network Service and Scheduling and Dispatch Service costs included in any of the ISO Expenses? If yes, explain why this is not double recovery. Identify the duplicated costs by FERC account number and sub-account number, if any. Provide a copy of the tariff provisions that permit the inclusion of these costs in both charges.

Date: June 3, 2005